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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

30 JUN 1993

IN REPLY REFER TO:
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JUN 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable Jim McCrery
House of Representatives
225 Cannon Building
Washington, D.C. 20515-1805

Dear Congressman McCrery:

This is in response to your letter of June 1, 1993, in which you inquired on behalf of your constituent, Mr. John Hitt, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). Mr. Sakala is specifically concerned about the potential impact of our final rules on radio remote controlled airplane hobbyists.

Model airplane users have shared spectrum on a secondary basis with industrial users for over 25 years. The low power industrial user and the radio control model airplane hobbyists effectively share spectrum through geographic separation. We are enclosing the Report and Order in GEN Docket 82-181, 47 FR 51875 (1982), which provided the current 50 channels for radio controlled model airplanes. These rules, adopted at the behest of the model airplane community, provide no protection from interference from licensed sources. We further note that the radio environment is inherently hazardous and that even primary allocations suffer from problems. For example, model aircraft users receive interference from other model aircraft users and from certain TV channels. Thus, model aircraft must be, and in fact are, capable of co-existing with some interference. As to Mr. Hitt's concern about the proposed frequency tolerance, this is a carryover from current rules and will be appropriately adjusted in any final rules.

The Commission is seeking to work with all parties on this matter. To this end, FCC staff has met with the two largest industry groups representing model airplane users, the Academy of Model Aeronautics and the Sport Flyers Association, to discuss their concerns and methods of expanding capacity for private land mobile radio users without affecting radio control users. Following the comment and reply comment periods, we will endeavour to adopt reasonable final rules as soon as possible.

We want to thank you for your interest. Your letter will be included in the formal record of this proceeding.

Sincerely,

/s/

Joseph A. Levin
Chief, Policy and Planning Branch
Private Radio Bureau

Enclosure

No. of Copies rec'd
List A B C D E

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JIM McCRERY
5TH DISTRICT, LOUISIANA

COMMITTEE ON WAYS AND MEANS

Congress of the United States
House of Representatives
Washington, DC 20515-1805

June 1, 1993

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92-235
2489

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Mr. James H. Quello
Acting Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Quello:

Enclosed you will find a letter from Mr. John Hitt, a constituent of mine along with material from the May issue of Model Aviation.

Mr. Hitt has some questions involving the FCC's proposal known as PR 92-235 and issues raised in the magazine. I believe you will find Mr. Hitt's letter self explanatory.

I am asking that the Commission evaluate Mr. Hitt's concerns and provide me a report of your findings. Please send your response to my Washington office.

Once again, thank you for your kind attention. I look forward to your response.

Sincerely yours,


JIM McCRERY
Member of Congress

JOM:wg

Enclosures (2)

DATE 4/23 AUTH W6
CODES 104, 132004
DOC# 132134

SHREVEPORT, LA. 71107
APRIL 19, 1993

DEAR MR. GLORE,

I JUST TALKED WITH YOU ON THE PHONE ABOUT THE PR DOCKET 92-235...

THE THING THAT PUZZLED ME ABOUT THE ARTICLE IN OUR AMA (ACADEMY OF MODEL AERONAUTICS) MAGAZINE, APRIL ISSUE, WAS THE STATEMENT ON PAGE 129 NEAR THE CENTER OF THE PAGE STATING THAT THE TRANSMITTER TOLERANCE TO BE ALLOWED THE NEW INSERTED FREQUENCIES PRESENTS A SIGNIFICANT PROBLEM. THE 92-235 DOCUMENT ALLOWS A FREQUENCY TOLERANCE OF 50 PARTS PER MILLION. THAT EQUATES TO 3.6MHZ. THIS SUGGESTS THAT NOT ONLY COULD THE NEW FREQUENCIES OPERATE DIRECTLY ON TOP OF OURS, BUT ON TOP OF THE NEARBY ASSIGNED ADJACENT FREQUENCY AS WELL. THE NEW FREQUENCIES ARE ONLY SKC APART.

AN EXPLANATION OF THIS WOULD BE APPRECIATED... ALSO, WITH OUR MODEL FREQUENCIES BEING ONLY 2.5KHZ AWAY FROM THE ADDED CHANNELS, WE WOULD BE MORE LIKELY TO BE DIRECTLY ON THE SAME FREQUENCY AS ONE OF THE NEW FREQUENCIES IF WE OR THEY, WERE NOT QUITE ON THE ASSIGNED FREQUENCY BUT WITHIN OUR LEGAL TOLERANCE.

I CALLED A LOCAL COMMUNICATIONS SHOP HERE IN SHREVEPORT, SHREVEPORT COMMUNICATIONS, AND ASKED THEM WHAT THE TOLERANCE IS FOR PRESENT SERVICES IN THIS BAND AREA, AND WAS TOLD IT WAS 1.5KHZ... WHICH IS NOT THE SAME AS THE 50 PARTS PER

February 10, 1993

Frequency Alert Status Report PR Docket 92-235

Reacting to letters filed by the Public Safety Communications Council and the Land Mobile Communications Council, the Federal Communications Commission (FCC) issued an order on February 9, 1993, extending the comment period for PR Docket 92-235. The February 26, 1993, deadline has been extended to May 28, 1993. The reply comment deadline has been extended to July 14, 1993.

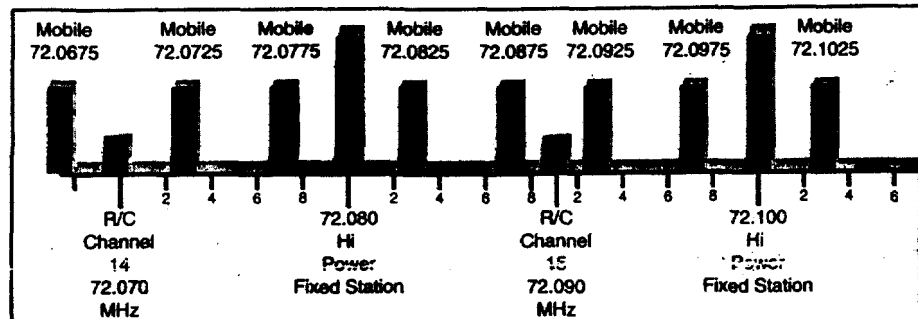
While this action may help the Academy and associated industry prepare even more comprehensive arguments—both philosophical and technical—detailing why the proposed rules are detrimental to frequency use by modelers, you are encouraged to continue the current persuasive writing campaign.

Additional ideas that might be incorporated into your letters, beyond those stated in the necessarily hastily composed first alert, could include the following:

1. We may view frequency use as a resource in much the same way as land. A certain portion of this nation's resources have always been set aside for recreational purposes. The frequencies we use are part of the recreational *parklands*. (in a letter by Chuck Smith)
2. The RC hobby/sport is a clean, wholesome activity that inspires young people, generates sportsmanship, disciplined thinking, and a sense of responsibility. (Tom Atwood, *Model Airplane News*)
3. Media programmers are exploring RC subjects for cable programming. (Tom Atwood, *Model Airplane News*)
4. RC modeling has contributed significantly to the military in Remote Piloted Vehicle (RPV) or Unmanned Aerial Vehicle (UAV) development and usage.
5. Most airplane designers and aerospace engineers were modelers first. Some still are (e.g., Burt Rutan, Paul MacCready). Many astronauts have been involved in modeling, both as a hobby and a sport (e.g., "Hoot" Gibson, National Aero-modeling Championships competitor).
6. Modelers' radio equipment just underwent changes to meet the requirements imposed by the 1982 frequency allocation. Additionally, industry accepted—on a *voluntary* basis—the narrow-band guidelines promulgated by the Academy, making it possible to safely operate in the current radio environment.

We would encourage all modelers to share their letters with us by sending a copy to AMA Headquarters.

Some Basic Facts: The following chart illustrates the proposed frequency placement. In the 72 MHz band a total of 31 out of the 50 frequencies are affected, most by being bracketed on both sides. Frequencies above channel 41 are not affected.



EXAMPLE

Frequency Raster Proposed by FCC NPRM PR Docket 92-235

Mobile transmitters are added at 2.5 KHz on each side of RC frequencies. Fixed frequency transmitters at 10 KHz spacing from RC frequencies have been present for many years.

Mobile transmitters will be authorized 1 watt output, i.e., two to three times the output power of the normal RC transmitter. Mobile transmitter frequency stability requirement is to be set at 50 parts per million. (± 3.625 KHz). This indicates that their frequency tolerance is very loose!

In the 75 MHz band, 10 are affected.

A one-watt transmitter, operating nearby only 2.5 kHz removed from a model frequency, will produce interference. The exact distance can only be determined by testing.

The transmitter tolerance to be allowed the new inserted frequencies presents a significant problem. The 92-235 document allows a frequency tolerance of 50 parts per million. That equates to 3.6 kHz. This suggests that not only could the new frequencies operate directly on top of ours, but on top of the nearby assigned adjacent frequency as well. The new frequencies are only five kHz apart!

Despite FCC staff assurances that the new frequencies are destined for industrial plant operations and are *not* mobile in the sense of transmitters moving about at will, the document does not support this limited usage statement. In any case, a number of AMA chartered clubs operate within the boundaries of, or very near to, industrial complexes.

Over the last year and a half, a consistent and recurring signal has been sent by FCC officials. Its theme was that model frequency use would not be affected by any of the proposed regulations! A thorough study of 92-235 does not support that signal.

Consider the closing statement in a recently prepared communication from the individual who drafted the document: "Finally, we recognize that our proposed rules are based on the information available

at the time we wrote them. We seek constructive information in order to adopt final rules that meet our objectives of expanding capacity for private land mobile radio users with *minimal or no harm* to all existing users of the spectrum."

The Academy's formal letter of comment will be filed by the end of February and will provide *constructive information* indicating possible harm to model frequency use. →

